



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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June 25, 2003

Barbara Anne Sousa, Esq.  
Verizon Massachusetts  
185 Franklin Street - Room 1403  
Boston, MA 02110

Susan M. Prosnitz, Esq.  
General Counsel  
Executive Office of Public Safety  
One Ashburton Place  
Boston, MA 02108  
For: Statewide Emergency Telecommunications Board

RE: Department's First Set of Information Requests to Verizon and the SETB  
E911 Surcharge Proceeding - D.T.E. 03-63

Dear Ms. Sousa and Ms. Prosnitz:

Enclosed please find the Department's First Set of Information Requests to Verizon and the Statewide Emergency Telecommunications Board in the above-referenced proceeding. Please provide the requested answers by Thursday, July 3, 2003. If you have any questions on this request, please contact me at (617) 305-3613.

Sincerely,

Joan Foster Evans  
Hearing Officer

cc. Mary Cottrell, Secretary  
Michael Isenberg, Director, Telecommunications Division  
April Mulqueen, Assistant Director, Telecommunications Division  
Service List

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS  
D.T.E. 03-63**

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Verizon and the Statewide Emergency Telecommunications Board ("SETB") the following Information Requests.

**I. Instructions**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Verizon ("Verizon" or "Company") and the SETB in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or the SETB or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Company or the SETB finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Joan Foster Evans, Hearing Officer, and one copy each to Michael Isenberg and April Mulqueen of the Telecommunications Division.

## **II. Information Requests**

Reference the Interim Surcharge Proposal.

- DTE-VZ/SETB 1-1 Refer to lines 1-5, identifying the annual costs of provisioning E911. Please identify the Verizon tariff provisions that specify the tariff rates for the items on lines 2-5. In addition, provide the source of the current number of records in the E911 database and the Public Safety Answering Points. Please explain how Verizon or the SETB calculated the estimated numbers on lines 2-5.
- DTE-VZ/SETB 1-2 Refer to lines 9-13, identifying the costs from the Relay Services and Disabilities Access Programs. Please provide a copy of the current contract that identifies the costs of the relay services program. In addition, provide any contracts defining the costs associated with the items listed on lines 11-13 (Outreach, Education and Administration; Quality Monitoring; and Specialized Customer Premise Equipment). Explain how the estimates in lines 9-13 were derived.
- DTE-VZ/SETB 1-3 Refer to line 15, identifying how the deficit is to be recovered from the surcharge. The proposal states that the deficit, along with \$381,000 per year for capital expenditures for the current E911 system that are not yet fully depreciated, are reduced by projected directory assistance revenues. Please explain what is meant by “are not yet fully depreciated.”
- DTE-VZ/SETB 1-4 Please provide an electronic copy of the most recent Annual Tracking Report filed with the Department.
- DTE-VZ/SETB 1-5 Refer to line 15, identifying how the deficit is to be recovered from the surcharge. Please provide a copy of the June 11, 2003 letter from Verizon to the Department identifying Verizon’s recent back-billing of the E911 infrastructure charge contained in Verizon’s tariff and interconnection agreements with competitive local exchange carriers.
- DTE-VZ/SETB 1-6 Refer to line 18, which represents an estimate for uncollectible revenues. Does Verizon provide its uncollectible revenues figure in any report filed with the Department or other government entity? If so, please provide a copy of the report identifying Verizon’s 2002 uncollectible revenues.

DTE-VZ-SETB 1-7    Reference the June 23, 2003 comments of AT&T Communications of New England, Inc. at 5. Please provide a copy of the most recent E911 annual funding report.